

June 17, 1998

Fred Gerdeman
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Rocky Flats Field Office
P O Box 928
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**Comments on the
Draft Decommissioning Program Plan**

Dear Fred

Enclosed are the comments of the Colorado Department of Public Health and Environment (CDPHE) on the Draft Decommissioning Program Plan (DPP) dated April 10, 1998. Incorporation of these comments into the Final DPP will result in a document approvable by CDPHE. As this is a RFCA sitewide document, the approval of EPA is also required, and we have shared our comments with them.

In RFETS's attempts to demarcate the line between deactivation and decommissioning, RFETS has emphasized the need to determine when the current mission for each facility at Rocky Flats is terminated. We believe that RFCA is clear on the jurisdiction of RFCA over building activities, however, if RFETS insists that a mission termination is necessary, we request that DOE provide the specific facility missions in the final DPP. We expect to review and comment on these missions prior to their inclusion, and request that the information include the mission of each facility, current mission status, and schedule for change of each building's mission. We have previously identified CDPHE project managers for each building at the site and suggest that these individuals work directly with the appropriate site staff for each facility in completing this review.

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We are prepared to meet with you to discuss our comments. Please contact me to schedule a meeting or if there are any questions. I will be out of the office from July 1 through July 10.

ADMIN RECCRD
SW-A-003227

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Sincerely,

Steve Tarlton, Unit Leader
Rocky Flats Oversight Unit

enclosure

cc Steve Gunderson, CDPHE
Tim Rehder, EPA
Joe Legare, DOE
Dave Shelton, KH
RFCAB

DRAFT Decommissioning Program Plan (April 10, 1998)
CDPHE Comments

<u>Section/ Page</u>	<u>Comment</u>
1 2	Line 49 states the plan is for the decommissioning of "contaminated" buildings. The term "contaminated" should be removed, as the process is for all buildings and includes provisions for determining if any building is contaminated.
1 2	Add the following language to the end of line 64 "[work controls] to be further defined in the RFCA decision document (i.e., PAM, DOP, or IM/IRA) "
1 1 1 3	Lines 125-126 change to read "updates of the overall D&D strategy and Site closure baseline "
1 1 1 4	Lines 146,147 state "DOE intends to inform the regulators and the public as soon as possible of significant changes to its building disposition program" Replace "inform" with "consult with"
1 1 3 6	(lines 231 and 233, plus) The proposed deactivation end points continue to be misleading. Removal of combustibles is not a clear demarcation between deactivation and decommissioning, combustibles are likely to remain in most if not all buildings in which deactivation is complete, as is the case in both 779 and 886. "Removal of other hazards to place the building in a safe and stable condition" is also not a determinant of the end of deactivation. For evidence of this see the hazards assessments in the 779 and 886 DOPs, significant hazards exist in deactivated buildings and must be controlled during the decommissioning process. In order to resolve this issue, replace lines 226 through 237 with RFCA Paragraph 25(y), the definition of deactivation.
1 1 3 7	Lines 264-266 state that the DPP includes the process for waste management and possible on-site disposal. Where is the process for possible on-site disposal discussed in the DPP? The process for waste management (i.e., process vs. remediation waste) is addressed in the June 17, 1998 letter from CDPHE to DOE. This letter clarifies the Site's confusion regarding the management requirements for the waste types. This approach should be incorporated into Section 2.3.4.
1 1 4 7	Line 284 - Insert "RFCA" in front of "IM/IRA process"
1 1 4 7	Line 286 - Insert "decision or " after RFCA and before "decision document"
1 1 4 7	Line 290 - following "threat of release" insert, "and is consistent with the decommissioning strategy for the facility "

RFCA Decision Document Decision Method

- 8 Line 318 insert "or decision" before "document"
 - 8 Line 332 insert "routine" before "maintenance"
 - 8 Lines 335 and 336 Replace "will" with "may "
 - 8 line 336 the phrase is repeated unnecessarily
 - 8 Line 340 Replace "moveable" with "portable "
 - 8 Footnote 2 Delete "all" activities "Removal of fixed equipment for reuse on- or off-site will be considered maintenance " Why? This statement appears to be more representative of "house keeping" type activities than maintenance activities In addition, in the event removal may impact contaminated equipment/material, a RFCA decision or decision document may be required
 - 8 Footnote 3 Add "[analyzed] and includes backlog, legacy and existing waste "
 - \ 8 Line 343 Delete item 5 These activities can be performed as decommissioning or as regulated otherwise
 - 9 Lines 370-371 after "out of scope", insert "or in the event assumptions used are no longer accurate "
- Figure 1 1 1 RFCA Decision Document Screen - Move the "Record Agreement or Approval" box so that for each answered "yes," an agreement would be obtained
- "Consultation under applicable statute(s)" is vague and of little value Elaborate on discussion with LRA
- 2 2 12 (line 444) delete "if required" Some form of survey results will be required for every building
 - 2 2 Line 458 - Remove the word "substantial "
 - 2 3 13 Line 487 - Replace the word "some" with "all "
 - 2 3 1 13 Delete the phrase "DOE declares that"
 - 2 3 3 14 Line 544 - Waste chemical removal will occur prior to decommissioning What is

intended by the phrase "reduction of chemical hazards?"

2 3 4 15 CDPHE has provided guidance for the management of remediation and process wastes in the letter dated June 17, 1998 Please incorporate that guidance into this section

2 3 4 Line 568 - Replace "RCRA" with "RFCA"

3 1 16 Line 608, insert, ", LRA agreement with typing," after "characterization report"

3 2 16 The entire section seems purposeless Suggest replacing with a section on stepwise approval of incomplete documents and the decision process for early actions, as described in the CDPHE letter dated February 26, 1998 regarding the Building 771, Line 30 Removal

3 3 16 Line 630, delete "and approve"

3 4 1 17 Line 646, delete "Types 2 and 3" and replace with "all"

Figure 3 4 1 second box should read "scoping" not "scoping meeting" The process of scoping the project is not limited to a meeting The box labeled "waste disposal - onsite" seems misplaced Wouldn't waste management include other options?

3 4 2 2 19 In line 696 RFETS commits to identifying areas with loose and fixed contamination within the reconnaissance level characterization In line 709/710 the language becomes more restrictive in describing the process as being based on process knowledge and historical information Please revise section 3 4 2 2 of the DPP to acknowledge the need to perform actual sampling during the reconnaissance level characterization phase

3 4 4 20 insert following the second sentence (line 710) "The RLCR is compared against proposed decommissioning activities to determine if those activities are feasible and to identify the need for quantitative in-process sampling and analysis "

3 4 4 20 What is the status of the *Decommissioning Characterization Protocols*? EPA provided numerous comments on the document on March 17, 1998 Based on recent discussions with EPA, these comments have yet to be addressed If completed, these protocols must be approved by the regulators and be consistent with MARSSIM guidance If to be discontinued in favor of MARSSIM, please replace references to "Decommissioning Characterization Protocols" with "MARSSIM"

3 4 4 20 Footnote 5 - Add the following language " [systems may be turned off] provided it can be demonstrated that these measures do not adversely impact the worker or the surroundings "

- 3 4 5 21 Line 752 - after "threat of release of a hazardous substance to" add "human health or"
- 3 4 6 1 22 Delete the word "initial"
- 3 4 7 1 23 (line 835) Is the table of contents applicable to PAMs also?
- 3 4 7 1 23 Project Approach - This section should include a deactivation end state/point checklist
- 3 4 7 1 23 The organization of the DOP IM/IRA Table of Contents is inconsistent with guidance provided-to and discussed-with RFETS management during previous discussions, particularly for the sections labeled "project approach and health and safety in the outline within the DPP

CDPHE has previously provided a copy of NRC Regulatory Guide 3 65, Standard Format and Content of Decommissioning Plans for Licensees under 10CFR Parts 30, 40 and 70 to RFETS as a reference starting point for preparation of an outline for a decommissioning plan. Although some aspects of the NRC format are not relevant, CDPHE sees a need for consistency with the two major sections of the NRC format. This includes the need for 1) a section describing decommissioning objectives, activities and tasks, (Activities) and, 2) a section describing methods used for protection of occupational and public health and safety. This results in a simple breakdown of the most important part of the plan into one section on activities and a second section on controls.

The proposed outline by KH mixes the two major topics, including some controls in its project approach section and omitting some NRC suggested information on controls from the section labeled "health and safety"

The Project Activities section should include a list or table of the major activities and tasks related to processes, systems, equipment and land to be decommissioned. A description and an analysis of the proposed methods for accomplishing the activities and tasks should be presented. The description should include a discussion of historical information on operational occurrences that could adversely affect decommissioning safety, and potential accidents that could have a significant impact on decommissioning safety. The analysis should show that decommissioning can be accomplished in a safe manner (from RG 3 65)

The controls section should include a description of the methods used to ensure protection of workers and the environment against hazards during decommissioning. Information from the KH proposed "project approach" section, such as work and emissions controls, RCRA closure activities, performance standards, environmental management or compliance approvals needed and the

hazards assessment and controls information should be included in the controls section

Tables for presenting the project activities, hazards and controls have proven useful and provided organization in the currently-being-considered 886 IM/IRA

A separate section should be provided in the outline to include plans and details of the final radiation surveys. To this point RFETS has provided details of the final survey later in the process than the DOP or IM/IRA. Planning for decommissioning should be mature enough so that final survey details are provided within the decision document, or if not available, reference to future development should be included. Plans for independent verification should be included here also. Although a commitment to compliance with MARSSIM methods may be adequate, additional detail would be preferable within the decision document.

- 3 4 7 1 25 Implementation Schedule - Add language to include document review time frames and review duration for information to be submitted during the project (i.e., survey results, demolition plans, etc.)
- 3 4 10 27 line 1004, Add language identifying the need for pre-demolition final characterization as well as post-demolition
- 3 4 10 27 line 1007, after protocols, insert "as approved by the LRA "
- 3 4 11 27 Add to line 1023, "A closeout report consistent with the Integrated Guidance Document requirements will be prepared for the project "